

# **EXHIBIT 4**

## **FILED UNDER SEAL**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

UBER TECHNOLOGIES, INC.,  
OTTOMOTTO LLC; OTTO  
TRUCKING LLC,

Defendants.

Case No.

3:17-cv-00939-WHA

OUTSIDE ATTORNEYS' EYES ONLY  
VIDEOTAPED DEPOSITION OF TIM WILLIS  
San Francisco, California  
Thursday, March 23, 2017  
Volume I

Reported by: SUZANNE F. GUDELJ

CSR No. 5111

Job No. 2576518

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1 but that's if -- assuming that you're networked,  
2 right?

3 MS. BAILEY: Object to form.

4 THE WITNESS: During that period, I'm not  
5 aware of him not having access to the network. 11:24:10

6 BY MR. MUINO:

7 Q And what if he's reading documents away  
8 from the office?

9 A He could WiFi at home.

10 Q Have you exported documents to your 11:24:22  
11 devices?

12 A Yes, I have.

13 Q How frequently do you export documents to  
14 your devices for your work?

15 A Not frequently. Rarely. 11:24:38

16 Q But you've done it before?

17 A Yes.

18 Q And why did you do it on those occasions?

19 A If I needed to communicate with a supplier,  
20 maybe a contract where I'm revising it; or they're 11:24:47

21 sending me a presentation, but I don't have to  
22 download -- I mean, it's downloaded from email, but

23 only if I -- typically only if I'm exchanging with

24 the supplier information. Red line documents, those

25 type of things that somebody needs to use, Excel or 11:25:06



25

Q They presumably have their own websites?

12:30:13

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1 A Yes.

2 Q They're not exclusive to Google Waymo?

3 A No.

13 Q Looking at this list, do you know if Uber  
14 uses some or all of these vendors?

15 A I wouldn't know. 12:31:12

16 Q Have you ever spoken with any vendor about  
17 its doing business with Uber?

18 A Yes.

19 Q And on what occasion --

20 A A vendor approached me -- 12:31:24

21 Q -- was that?

[REDACTED] to let me know that they were  
23 planning on -- or that Uber had reached out to them  
24 to do business with them.

25 Q When did that occur? 12:31:37

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1 BY MR. MUINO:

2 Q In your experience, do Google employees,  
3 former Google employees, after they leave the  
4 company, ever get consulted in connection with their  
5 work? Is there any follow-up to ask them questions 12:59:55  
6 pertinent to their former work?

7 MS. BAILEY: Object to form.

8 THE WITNESS: Not that I'm aware of.

9 BY MR. MUINO:

10 Q Do you know if after Mr. Kshirsagar left, 01:00:07  
11 anyone contacted him to ask him questions about his  
12 prior work?

13 A I never reached out to him, no.

14 Q How about Mr. Raduta?

15 A I never reached out to him. 01:00:18

16 Q Now, you don't have any information that  
17 Uber is using any of Waymo or Google's trade  
18 secrets, do you?

19 MS. BAILEY: Object to form.

20 THE WITNESS: No. 01:00:41

21 BY MR. MUINO:

22 Q And you may be aware there's an allegation  
23 that 14,000, approximately, documents were  
24 misappropriated. That's an allegation in this case.  
25 You don't have any information that Uber is using 01:00:58

1 I, the undersigned, a Certified Shorthand  
2 Reporter of the State of California, do hereby  
3 certify:

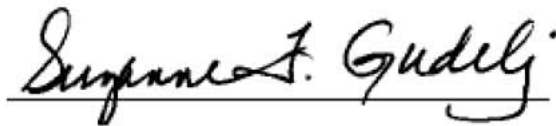
4 That the foregoing proceedings were taken  
5 before me at the time and place herein set forth;  
6 that any witnesses in the foregoing proceedings,  
7 prior to testifying, were duly sworn; that a record  
8 of the proceedings was made by me using machine  
9 shorthand which was thereafter transcribed under my  
10 direction; that the foregoing transcript is a true  
11 record of the testimony given.

12 Further, that if the foregoing pertains to  
13 the original transcript of a deposition in a Federal  
14 Case, before completion of the proceedings, review  
15 of the transcript [ ] was [X] was not requested.

16 I further, certify I am neither financially  
17 interested in the action nor a relative or employee  
18 of any attorney or party to this action.

19 IN WITNESS WHEREOF, I have this date  
20 subscribed my name.

21 Dated: 3/24/17

22   
23

SUZANNE F. GUDELJ

24 CSR No. 5111  
25